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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ANGELA MARIA LOPEZ RODRIGUEZ,
Plaintiff,
v.
KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

Civil No. 1:21-cv-00490-DAD-BAM

**STIPULATION TO EXTEND
BRIEFING SCHEDULE**

1 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security
2 (the "Commissioner"), shall have an extension of 30 days to respond to Plaintiff's Motion for Summary
3 Judgment in this case. In support of this request, the Commissioner respectfully states as follows:

4 1. Counsel for the Commissioner previously referred this matter to his client to consider the
5 defensibility of this case and his client is in the process of evaluating this matter. Counsel for the
6 Commissioner believes that this short extension may resolve this matter without necessitating this Court
7 to address the merits of this matter. Moreover, this brief extension would conserve judicial time and
8 resources should the Parties be able to resolve this matter.

9 2. This is the Commissioner's second request for an extension.

10 3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that he
11 has no objections.

12 4. This request is made in good faith and is not intended to delay the proceedings in this
13 matter.

14 WHEREFORE, the Parties stipulate that Defendant will have until August 8, 2022 to respond to
15 Plaintiff's Motion for Summary Judgment.

16 Respectfully submitted,

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18 Date: July 8, 2022

PEÑA & BROMBERG, PLC

19 By: /s/ Caspar Chan for Francesco Benavides*

20 JONATHAN PENA

FRANCESCO BENAVIDES

21 *Authorized by email on July 8, 2022

22 Attorneys for Plaintiff

23 Date: July 8, 2022

PHILIP A. TALBERT

24 United States Attorney

Eastern District of California

25 By: /s/ Caspar Chan

26 CASPAR CHAN

27 Special Assistant United States Attorney

28 Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, and for cause shown, including the conservation of judicial and party resources, the Commissioner's request for an extension of time to respond to Plaintiff's Motion for Summary Judgment is GRANTED. The Commissioner shall file an opposition to Plaintiff's Motion for Summary Judgment on or before August 8, 2022. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: July 8, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE